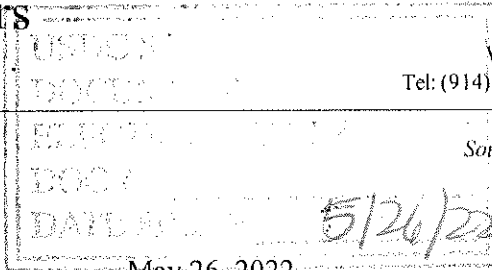


**Federal Defenders  
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Executive Director  
and Attorney-in-Chief

Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge



May 26, 2022

VIA ECF & EMAIL

The Honorable Paul E. Davison  
United States District Judge  
Southern District of New York  
300 Quarropas Street,  
White Plains, NY 10601

*All 4 requests  
granted on consent.*

APPLICATION GRANTED

Hon. Paul E. Davison, U.S.M.J.

*5-26-22*

Re: *United States v. Dimas Ramirez, 21-cr-3591 (UA)*

Dear Honorable Judge Davison:

I write to respectfully request that the Court modify Mr. Ramirez's bail conditions to permit certain travel this month and next. Specifically, to permit him to travel to the District of New Jersey on May 31<sup>st</sup> to drop off his car to be fixed and on June 1<sup>st</sup> to pick up his car. In addition, he requests permission to travel to the District of New Jersey, specifically Bergen County, for work purposes only. He would also like to open his pool and was hoping to do that tomorrow, May 27, 2022, from 9 a.m. to 4 p.m. Finally, he respectfully requests permission to attend his son's graduation on June 22, 2022, from 9 a.m. to 2 p.m. (travel time is included in this request).

- ①
- ②
- ③
- ④

Mr. Ramirez was arrested on April 1, 2021, and charged with receipt and distribution of child pornography in violation of 18 U.S.C. §§2252A(a)(2)(B), (b)(1). Mr. Ramirez made his initial appearance on that same date before the Honorable Paul E. Davison and was released on bond. Mr. Ramirez has continued to comply with his conditions while on pre-trial release, has been attending mental health treatment, and is employed.

Mr. Ramirez lives in Rockland County near the border with Bergen County in New Jersey. He needs to have his car serviced. He typically does that at Prestige Toyota in Ramsey, NJ. He is seeking permission to bring his car to be serviced on May 31-June 1. In addition, Mr. Ramirez has worked for Rockland Electrics for the last 16 years. The company provides electric and gas services for residential homes and covers Orange and Rockland County in New York and Bergen County in New Jersey. Mr. Ramirez primarily works in Rockland County. However, if there is a storm, he may be required to cover Bergen County as well. He respectfully requests that his travel condition be modified to permit travel to the District of New Jersey, specifically Bergen County, for work purposes only.

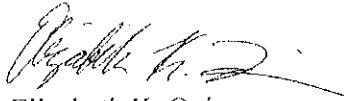
Due to his electronic monitoring, he is not permitted to be outside of his home without prior approval. With the warmer weather approaching, he was hoping to open his pool and

respectfully requests permission to do tomorrow. He expects he should be able to accomplish that with a time window from 9 a.m. to 4 p.m. Finally, his son is scheduled to graduate from high school on June 22, 2022 and he would like to attend that ceremony.

Mr. Ramirez's Pre-trial Officer, Leo Barrios, has no objection to this request. I have contacted the Government, through Assistant United States Attorney Marcia Cohen, who also has no objection to this request.

Thank you for your time and consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Elizabeth K. Quinn", with a stylized flourish at the end.

Elizabeth K. Quinn  
Assistant Federal Defender

cc: Marcia Cohen, AUSA  
Leo Barrios, PTO